

TRO Exhibit 6: Surveillance Wiretap Violation

EXHIBIT 6

SWORN STATEMENT REGARDING ILLEGAL SURVEILLANCE, PRIVACY INVASION, AND RETALIATORY MONITORING

I, Lester Aubrey Lee, Jr., make the following statement under penalty of perjury pursuant to 28 U.S.C. 1746:

The Brookside Park Condominium Association, under the direction of President Robert Haddad and with the involvement of attorney Anthony D. Dwyer, has installed and operated unlawful surveillance devices that directly violate both civil and criminal statutes. A peephole camera was installed directly across from my door, and a Ring camera was installed outside the foyer of Latresa Hickst two floors below me specifically positioned to record my entrances and exits from the building. These installations were made not by Hicks, but by or with the explicit approval of the Condominium Association, as confirmed in internal email communications involving attorney Dwyer.

This surveillance was conducted without notice, consent, or legal justification and constitutes a violation of the Maryland Wiretap Act, Md. Code, Cts. & Jud. Proc. 10-402, which criminalizes the unauthorized recording of private conversations and conduct. This is not merely a civil overreach; it is a criminal act implicating both the attorney of record and the Association President.

In addition, AI-powered license plate reader cameras were installed at the property within the last two months without any resident disclosure, warning, or consent. These systems are capable of tracking vehicle movement, storing sensitive data, and performing predictive monitoring all in secret. There has been no explanation of what is collected, how long it is stored, or how it is used.

Security and maintenance staff have been given standing orders to track my whereabouts, and board members have been instructed to 'spread the word' and surveil my activities. These actions are not routine; they are calculated, targeted, and retaliatory. Defendants have demonstrated bad faith and have already engaged in unlawful behavior.

I respectfully request that the Court:

1. Issue an order mandating full disclosure of all physical and electronic surveillance devices used by Defendants or their agents.
2. Require the immediate preservation of all surveillance footage and metadata.
3. Order the immediate cessation of all surveillance, including AI-camera systems, Ring devices, and any manual surveillance activities.
4. Enter an injunction prohibiting any future surveillance of my person, home, or vehicle by Defendants or any of their affiliates.

I am terrified. These actions are retaliatory, invasive, and dangerous. The involvement of legal counsel in these violations makes the need for immediate judicial intervention even more urgent.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on June 11, 2025.

A handwritten signature in black ink, consisting of a stylized, cursive 'L' followed by a long horizontal line extending to the right.

Lester Aubrey Lee, Jr.

Plaintiff Pro Se